

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

NO. 3:24-cv-05095-BHS

STATE OF WASHINGTON,
DEPARTMENT OF LABOR AND
INDUSTRIES,

Plaintiff,

v.

GEO SECURE SERVICES, LLC, THE
GEO GROUP, INC.,

Defendants.

NO. 3:24-cv-05029-BHS

STATE OF WASHINGTON,
DEPARTMENT OF HEALTH,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

NO. 3:24-cv-05095-BHS
NO. 3:24-cv-05029-BHS

DECLARATION OF
MARY KAYE ECKMANN

I, MARY KAYE ECKMANN, declare under the penalty of perjury under the laws of
the United States that the following is true and correct.

1 1. I am over the age of eighteen and am otherwise competent to testify. I make these
2 statements on personal knowledge and belief. My legal name is Mary Kaye Eckmann but I go by
3 Kaye in my work.

4 2. I am a Database Administrator for the Washington State Department of Health
5 (DOH), Division of Environmental Public Health (EPH), Office of the Assistant Secretary
6 (OAS). My current position within DOH started on January 1, 2024. I have a Bachelor of Science
7 degree in Cell and Molecular Biology from the University of Washington.

8 3. I am part of a team at the Department of Health responsible for investigating
9 complaints from detainees at private detention facilities. The Department also has general
10 authority to investigate threats to public health under RCW 43.70.170.

11 4. We have received numerous, serious complaints from detainees at the Northwest
12 ICE Processing Center. These complaints gave rise to a concern that the conditions at the detention
13 facility may constitute a threat to public health. We are especially concerned about recent
14 complaints and reports our office has received about detainee deaths and suicide risks. DOH
15 considers suicide to be a public health threat.

16 5. Amanda Soleil Maria Muñiz (Soleil), a co-worker, and I visited the Northwest
17 ICE Processing Center on February 28, 2024, from 10:22 AM until 10:49 AM.

18 6. We checked in at the reception desk at 10:22 AM and Soleil said we were from
19 DOH and that we were requesting to see Mr. Scott. The man thought that we were from Pierce
20 County Department of Health, and I politely clarified that we were from Washington State DOH.

21 7. We waited in the lobby until Mr. Scott and another man entered the lobby. I shook
22 Mr. Scott's hand, said hello to him, and asked the other man if I had met him before and he said
23 that this was the first time he had met with us. He told Soleil and me that his name was
24 Mr. Santiago. Soleil formally introduced me to him, and we shook hands.

25 8. Soleil asked Mr. Santiago if he had a business card and he said he did not have
26 one. She politely asked him what his position was, and he told her he was a supervisor.

1 9. Soleil informed both Mr. Scott and Mr. Santiago that I would be talking with
2 them today since she had lost her voice, and it was not fully recovered.

3 10. I told them that in the spirit of transparency, we had received some concerns and
4 I wanted to let them know what those were and asked them if that was all right with them.
5 Mr. Scott nodded in approval and I continued.

6 11. The concerns I mentioned were (I used the word “concerns” throughout my
7 dialogue):

8 a. The bathrooms and showers were dirty and there were fungal infections on
9 detainees’ feet.

10 b. The food was, at times, being served late and sometimes several hours late.

11 c. The HVAC system/heating system was possibly malfunctioning and that it was
12 cold at night, and detainees were asking for additional blankets because they were
13 cold.

14 12. Both Mr. Scott and Mr. Santiago were very engaged in listening well, with good
15 eye contact. They made no comment.

16 13. At the end, we wished them a good day and we signed out at the reception desk
17 at 10:49 AM and left the building.

18 14. Soleil and I spoke to them with kindness.

19 15. We were respectful, professional, and polite.

20 16. Mr. Scott and Mr. Santiago were respectful, professional, and polite as well.

21 17. On Friday, March 8, 2024, I received an email from a member of the group La
22 Resistencia. The email included a report released by La Resistencia regarding the death of a man
23 who was held in custody at the Northwest ICE Processing Center in Tacoma, Washington.
24 According to the report, the death occurred on March 7, 2024, between 10:30 and 11:30 AM,
25 and others detained say that the man had committed suicide while in the isolation unit.
26

1 18. La Resistencia submits complaints to DOH against the Northwest ICE Processing
2 Center in Tacoma.

3 19. One complaint submitted by La Resistencia on March 7, 2024, said that “a dark-
4 skinned guy who was in the hole hung himself at 10:45 a.m.”

5 20. Another submitted complaint, on March 8, 2024, described the treatment and
6 conditions as “very stressful” and that if you had suicidal thoughts, you were isolated in a room
7 without clothes and with an officer present 24 hours a day.

8 21. Another complaint submitted by La Resistencia on March 8, 2024, states “There
9 is allot of detainees here with suicide thoughts because of the conditions of this place.” They go
10 on to say, “People are dying slowly emotionally, psychologically, mentally, and more in this
11 facility. Detainees comes in normal, and leaves here abnormal.”

12 22. On March 11, 2024, La Resistencia released a bulletin that reported the attempted
13 suicide of two other detainees of Northwest ICE Processing Center. Their report states that
14 detainee-lead hunger strikes have begun in response to the recent death of the detainee.

15 23. I am concerned for the health and safety of detainees, but that concern has
16 heightened in light of the recent deaths and threats of suicide.

17 I declare under the penalty of perjury under the laws of the United States and the state of
18 Washington that the foregoing is true and correct.

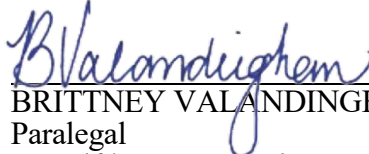
19 SIGNED this 22nd day of March, 2024 in Tacoma, Washington.

20
21 
22 MARY KAYE ECKMANN

CERTIFICATE OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System, which will serve a copy of this document upon all counsel of record.

DATED this 22nd day of March 2024 at Seattle, Washington.


BRITTNEY VALANDINGHAM
Paralegal
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 389-3895
Brittney.Valandingham@atg.wa.gov